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**VIA ELECTRONIC MAIL,
AND U.S. MAIL**

December 22, 2006

SR-6J

Mr. Jerry C. Winslow
Principal Environmental Engineer
Xcel Energy
414 Nicollet Mall (Ren. Sq. 8)
Minneapolis, Minnesota 55401

RE: Comments to Xcel's Response to EPA's Draft RI Comments
Ashland/NSP Lakefront Superfund Site

Dear Mr. Winslow:

On August 29, 2006, the United States Environmental Protection Agency (EPA) sent Northern States Power Company (NSPW)/Xcel Energy's (Xcel) comments on the draft Remedial Investigation Report (RI) for the Ashland/Northern States Power Lakefront Superfund Site. On October 27, 2006, Xcel sent responses to EPA's comments. Pursuant to the Administrative Order on Consent (AOC), EPA requires Xcel to make modifications to the RI based on the comments provided below. In addition, please make modifications to the RI based on the comments you agreed to in the October 27th response letter. Under Section X of the Administrative Order on Consent (AOC), this letter constitutes a notice of deficiency and Xcel has 21 days to cure the deficiencies before EPA makes modifications to the RI Report pursuant to Paragraph 21(c). Xcel is receiving the letter today, starting the 21 day clock to incorporate these comments and submit the revised RI Report by January 12, 2007. Xcel requested additional time and by this letter EPA is giving Xcel another (13) days, until January 25th, to submit the revised RI Report.

General Comments

1. **Data Presentation:** 1,2,4-trichlorobenzene will be included in the "Final Analyte List for Soil and Groundwater Samples" and addressed in the RI Report. Influent concentrations detected from the recovery system will be discussed in the RI Report. In addition, n-butylbenzene detections in soil; and chloroform, chloromethane, methylene chloride, and pyridine detections in groundwater will be explained in the narrative of the RI Report. Tables will be provided in the RI that identifies the regulatory standards that will be used for comparison purposes in the RI Report.

Please include a map, or set of figures that depict plan view, total PAHs in sediments, without "depth of sediments", in isocons of <1, 5, 10, 20, 50, 100... A similar figure including Kreher Park (historic lakebed) would also be helpful in understanding the CSM.

2. **Response to General Comment Number 2:** During the meeting on November 8, 2006, to discuss EPA's comments on the draft RI Report, EPA agreed that Xcel can include the

statistical tables in the RI Report. EPA did not, however, agree to the use of the statistical approach to evaluate the data for extent of contamination. For this reason the RI Report should not use of 95% UCL and averages to determine the extent of contamination. The summary tables, which do contain a vast amount of relevant data, would remain in the RI Report.

It is incorrect to state that parameters can be dropped if they are not associated with the contaminant sources at the Site. For example, chlorinated solvents detected at the site could be from the operations at the Site following cessation of the manufactured gas plant (MGP) and therefore it cannot be dropped.

3. **Response to General Comment Number 3:** The fate and transport (F&T) section will be revised to include the F&T of the constituents found to exceed regulatory standards. The statistics included in the draft RI will not be used to evaluate the fate & transport of contaminants. The F&T discussion will not be limited to VOCs and PAHs, and must include a discussion of metals and any other classes of contaminants not discussed in the draft RI. For information purposes, the statistical evaluation can remain in the table, but discussion of the statistical evaluation will not be included in the RI.
4. **Response to General Comment Number 5:** Even though the RI explains the discharge of free product in the ravine through the pipe network, it does not explain the discharge of free product in the ravine prior to existence of the pipe network. There is no documentation known to be present suggesting that free product was not discharged in the ravine prior to existence of the pipe network. There is every possibility that free product was discharged in the ravine from the beginning of the manufactured gas production (long before the pipe network was placed). (Also refer to Specific Comment 1 below). Therefore, it must be clearly stated in the RI that free product disposed into the ravine discharged into the former bay area which is now known as Kreher Park.

First Bullet: Since there is a contradiction on how the volume estimates were calculated, the volume estimates will be removed from the RI.

Second Bullet: EPA disagrees with the response to this comment. Therefore, the MGP process will be clearly described in the RI because the processes and waste streams from the MGP resulted in contamination. All readers of the RI may not be familiar with the MGP processes and waste streams and the RI should be a stand alone document. It is important to describe the processes and waste streams from the MGP process.

Third Bullet: Ravine Fill - NAPL has been detected throughout the filled ravine from the ally to its terminus at the historic lakeshore. This is supported by the boring logs for B-1, B-20, B-21 and B-22. During the excavation of the 12" clay tile pipe, it was hard to tell whether significant product was present at the base of the ravine so we rely on the borings. There is no "subsequent" information to change that finding. NSPW states that it was "stained soil". What was the soil "stained" with? The boring logs not only note "saturated with coal tar-black oily substance, wet, strong odor" but the associated PID/FED readings spike at the tar intervals (Dames & Moore, Aug. 1995). It will be clearly stated in the RI that NAPL was present the full length of the ravine.

Copper Falls – Whatever the NAPL transport route to the Copper Falls was/is no plume is ever completely “stable”. Neither WDNR nor EPA agreed that the migration within the MW-4 well nest was due to degradation of the well seal but rather agreed to the need to abandon it. Within the area of the Copper Falls, a downward gradient exists with a substantial head of NAPL as confirmed during the SITE project drilling. The drilling further defined the gas holder in that area to be approximately 18 feet below ground surface (bgs), leaving only a couple of feet between it’s base and the top of the Copper Falls. The holder also had a number of feet of NAPL inside of it. This could have been one of the conduits for migration. Please modify the RI and include other possible migration scenarios as described above.

2” Pipe to Tar Dump – A two inch steel pipe was excavated from the filled ravine area. It is not known whether this pipe was the pipe depicted in the Greeley & Hanson drawings, or more likely part of the liquid propane system installed after MGP operations. LP gas was pumped from the “tank car siding” to the MGP property. LP gas and air pipes were installed to carry that out. Those pipes are documented in the LSDP drawings supplied by NSPW. There is no documentation that the excavated 2” pipe had anything to do with the MGP operations and may be from some other operation. Therefore, it does not mean the “2 tar pipe to the waste tar dump” did not exist and possibly acted as a conduit in the past. Please modify the RI and include other possible migration scenarios as described above.

12” Clay Tile Pipe – The existence of this pipe and clear evidence that NAPL migrated down it shows that it was part of the MGP operation (as a conveyance of MGP wastes) and it needs to be shown on the drawings of the MGP operation.

Fifth Bullet: As discussed and agreed to by EPA and NSPW in the November 8, 2006, meeting, the 95% UCL will remain in the summary tables; however, the averages and 95% UCLs will not be used to evaluate the nature and extent, nor the fate and transport of contamination. See also above comment to General Comment #2.

Sixth Bullet: The mode of deposition of wood waste is not a subject of only the SSA report, but is also a subject of the RI report. The RI report should describe in details how the free product and contamination was transported to the sediment. The RI report should describe if the sediment was contaminated prior to deposition of the wood waste. Due to limited information of waste handling at the MGP, the free product may have been discharged into the Bay area prior to placement of wood waste. Therefore, it is possible that free product could have contaminated the sediment prior to placement of wood waste on top of the sediment. This needs to be stated in the RI.

Seventh Bullet: The response to this comment attempts to make the indirect statement that LNAPL should not be considered a free product. EPA does not consider this to be valid and considers LNAPL to be free product. This needs to be stated in the RI. This includes the presence of sheens in test pits and monitoring wells. Sheens in test pits are evidence of free product within the media being disturbed. Dissolved phase contaminants can not cause sheens. As seen in many areas of the site beyond the discharge pipe (mouth of the ravine) the NAPL contaminants exist in globule form. This has been evident during sediment collection as well as in areas of the filled lake bed. When disturbed, these globules will form a sheen on the water’s surface. Additionally,

the test pits did not remain open for a long enough time period to determine if free product is present nearby. If test pits had remained open for a longer period of time, free product may have accumulated in various test pits. Was the sheen present in the groundwater wells that had concentrations below 4,000 ug/L? Where were these samples collected with respect to well screen? Was the sheen sampled?

5. **Response to General Comment Number 6:** As discussed at the November 8, 2006, meeting, NSPW will use regulatory limits to define the ranges presented on each figure that depicts the extent of contamination. Additionally, each of the constituents found to exceed regulatory standards must be presented in a figure, not on an as needed basis as stated in the response to this comment.
6. **Response to General Comment Number 7:** As discussed at the November 8, 2006, meeting, NSPW will create and include in the RI electronic tables all of the data, by media, by depth, by location, and will highlight the results that exceed any of the regulatory standards.
7. **Response to General Comment Number 8:** The RI document must be a stand-alone document, and as such, will not direct readers to other documents. "Appendix D of the D&M March 1999 Ashland Lakefront Site Feasibility Report" needs to be included in the RI if it is used to present the calculations of free product volume. However, as mentioned in the Response to General Comment Number 5, First Bullet, the volume estimates will be removed from the RI.

Response to Specific Comments

1. **Response to Specific Comment 1:** Since there is contradictory "eye witness" reports as to whether the wood treatment took place at Kreher Park, modify the RI Report to clearly state that other industrial operation activities (sawmill, railroad) took place at the lakefront. It can be mentioned that wood treatment and feed stock spills may have taken place but since it has not been substantiated, it should not be utilized in the RI Report for making any conclusions.

Include in the historical background of the RI Report a discussion of the 1902 city ordinance and how it relates to the transport of MGP wastes to Kreher Park and the Bay. It is important for the overall discussion on how MGP wastes ended up in Kreher Park and the Bay. The 1902 city ordinance is specific to MGPs within the city (there was only one). According to the ordinance: "WASTES PRODUCED FROM GAS PLANTS TO BE CONDUCTED UNDER GROUND. Section 57. *No person or company being the manufacturer of gas or engaged about the manufacture thereof shall throw or deposit or allow to run or having the right or power to prevent the same shall permit to be thrown in any public water, river, canal, slip, bay or inlet or into any street vacant lot or public place **except through underground sewer** any gas, tar or any refuse mater of or from any gas house, works, or manufactory...*" (emphasis added)

By no means does this ordinance point to the City to install the 12" clay tile pipe but it does require the MGP to no longer dispose of their waste aboveground (ravine). This needs to be put into proper perspective within the RI.

The ordinance required the MGP to stop disposal of the MGP wastes aboveground (ravine). It is clear that the onsite ravine was used for disposal of MGP wastes during the MGP operation before the pipe network was installed in the early 1900's. The coal tar disposed in the ravine ultimately discharged into Kreher Park which was originally part of the Bay before that area was filled in. Also, the coal tar continued to seep into Kreher Park after the operation of the MGP was discontinued and the Bay had been filled to the base of the ravine forming Kreher Park. The coal tar discharged in Kreher Park by the MGP would have been distributed in the Kreher Park area and the Bay area through wave movements. The coal tar also could have mixed with other sources (including the former coal tar dump) containing PAHs. Therefore, since the coal tar from the MGP was discharged in the former bay area and continued to discharge in the seep area in Kreher Park for a long time after discontinuation of the MGP, the contamination detected at Kreher Park and the Bay area is attributable to the MGP process. This possible scenario should be used in a Conceptual Site Model (CSM).

The historical background should also include a discussion of the Railroad Commission annual reports and the Browns Directories. The Railroad Commission reports were required by law and signed by the company president and thus should carry a very high weight. The Browns Directory was an industry accounting process where the utility submitted information for industry publication. Production numbers within the Railroad Commission reports for this plant indicate that for many years tar collection was not recorded and for many other years it actually states "none" under the tar collected account. The 1938 Railroad Commission report was the first to account for tar collection.

2. **Response to Specific Comment 2, Second Paragraph:** Ensure that the statement that "the ravine fill materials consist of both liquid and solid MGP wastes" is included in the RI Report.

Fifth Paragraph: The NSPW comment does not directly address the comment; the "augmented" discussion should include the discussion between the lake level and the water levels in Kreher Park.

3. **Response to Specific Comment 4:** EPA does not agree with the response that the discharge of free product (coal tar) has not been corroborated, or that evidence of such discharge has not been documented. The transport mechanism of coal tar from the MGP site was through the ravine to Kreher Park (before and after it was filled in). Even though it is clearly not known if other sources were present in Kreher Park that contaminated the Kreher Park and Bay Area with high PAHs, however, based on waste disposal practices it can be assumed that the coal tar was disposed in the Ravine that discharged to Kreher Park (before and after it was filled in) and Bay area. This information is adequate for the RI Report to conclude that one of the major sources of contamination in the Kreher Park and Bay area is the former MGP plant. This must be clearly stated in the RI.

In addition, it has been documented that free product existed outside of the clay tile pipe along the base of the ravine from the MGP to the mouth. If discharge to the ravine was not the case, where did these wastes go? Analytical and forensic data support that it is MGP waste.

4. **Response to Specific Comment 6:** Ensure that the tables comparing each contaminant detected by media are presented in the RI. Also ensure that the tables are included in the RI Report. Also include all tables in the RI Report that present a list of the regulatory standards used in the RI. Include separate tables for each of the following: soil, sediment, surface water, groundwater, and soil gas must be included. These should be stand alone tables that present solely the regulatory standards for each analyte, regardless of detection, or exceedance.
5. **Response to Specific Comment 7:** The NSPW response to this comment is no longer applicable. As discussed in the November 8, 2006 meeting, the statistics will remain in the tables in the RI Report, but will no longer be used to evaluate nature and extent and the fate and transport of constituents above regulatory standards. Therefore, statistical information from the draft RI Report will be removed from the text of the report.

Additionally, the 95% UCLs appear to have been calculated for each dataset, without regard to sample size, number of detections, dataset normality, etc. The procedure used for calculating the UCLs must be documented and included in the RI Report.

6. **Response to Specific Comment 8:** Several boring logs are discussed in this response, if the boring logs were not included in the draft RI Report, they should be included in the revised RI Report (this applies to all comments in this letter).

First Bullet: The response to this comment indicates that other borings will be used to define the extent of free product, and those will be included on Figure 4-1. Boring B-23 is listed in the response as not having free product; however, the boring log includes “oily black liquid” from 4.5 to 7 ft bgs. Therefore, this boring will help to identify other locations that do contain free product. The extent of free product in the Upper Bluff/Filled Ravine will be re-evaluated following the submission of the revised RI Report document.

Fourth Bullet: The comment is acceptable. However, if the green line is to remain in close proximity to boring GP-134, GP-131, and GP-128, then it must be made a dashed line to indicate that the true extent is inferred. The other approach would be to extend the green line to at least halfway to the closest clean boring (is it B-35?), because the southern extent is not truly defined in this direction. Although the gas holders did not extend further south, it is not adequate to define the extent of free product.

Sixth Bullet: Include the boring locations in Figure 4-1, and discuss in the RI Report how the extent of free product in this area has been delineated to the extent practical. If the boring logs were not included in the draft RI Report, they should be included in the revised RI Report (this applies to all comments in this letter).

7. **Response to Specific Comment 9:** Refer to General Comment 5, last bullet.
8. **Response to Specific Comment 10:** Address the fact that free product has not been delineated. Figure 4-2 clearly does not define the extent of free product at the seep, even if GP-157 and GP-149 are excluded from the blue outline. As discussed previously, the sheens observed in the test pits are indications of free product present in the vicinity of the test pits.

9. **Response to Specific Comment 11:** Include GP-140 on Figure 4-2. The revised RI Report should indicate the limitations in this area, and should indicate why the extent of free product could not be defined.
10. **Response to Specific Comment 12:** It is clear that over time discharges took place both down the ravine and later through the pipes. During the first years of the plant operation, the filling of the bay was only to the east of the mouth of the ravine. Filling advanced from the east to the west. This filling would have covered up contamination that would have already been deposited. This is true for the entire lakebed area. The discharge locations may have changed over time as the pipe system grew due to the filling activities. Later, discharges may have occurred into or atop of the fill. Historical drawings, the City Ordinance, borings and test pits within the sediment and park area corroborate this scenario. This scenario must be clearly stated in the RI Report.

Refer to General Comment 5, Sixth Bullet. It is inappropriately stated that the mode of deposition is the subject of the Sediment Stability Assessment report. The mode of deposition is also a subject of the RI.

11. **Response to Specific Comment 13:** Please revise/clarify as indicted in the NSPW response. A detailed description is needed in the RI Report for explaining the decisions made on experience as well as historical groundwater concentrations.
12. **Response to Specific Comment 14:** Revise to state to the “southwest” of well nest 21A/B, not to the east.
13. **Response to Specific Comment 15:** EPA concurs with NSPW that the arsenic in the soil is likely attributable to background conditions. However, the extent of arsenic contamination must still be presented in the RI Report. If arsenic exceeds regulatory standards in each sample, then this must be stated and the extent is to be all inclusive. The argument can then be made that arsenic levels at the site are elevated in background samples, and that arsenic is not a constituent of concern.
14. **Response to Specific Comment 16:** Delete the statement that “only low levels of VOCs were measured in background samples.” The QA section in Appendix F4.5 indicates that only a few compounds were rejected, such as toluene, due to MS/MSD recovery issues. The other instance where toluene data would have been changed to a non-detect result if a blank sample had a toluene detection that was five times or less than the toluene detection in the sample. Based on this information, toluene associated with MS/MSD issues or blank contamination would have been rejected or qualified as non-detect, neither of which appear to apply to the 9,300 ug/kg detection in GP-159. Therefore, the background sample is considered to contain a significant concentration of a site contaminant. Again, background samples with such conditions are suspect at best and should not be used to establish background conditions.
15. **Response to Specific Comment 17:** As discussed in the November 8, 2006, meeting the 95% UCL will no longer be used to evaluate nature and extent of contamination. Since this section will be re-written to reflect direct comparisons against regulatory limits, the comment and response to comment by NSPW are no longer applicable.

16. **Response to Specific Comment 18:** Regarding arsenic, see comment 13 above. In a similar fashion to arsenic, iron should be discussed with respect to regulatory standards and the statement should be included that the extent of iron above the standards encompasses the entire Site.
17. **Response to Specific Comment 19:** See comment 14 above. Based on the material in Appendix F4.5, the toluene detection at 9,300 ug/kg appears to be a true detection and is considered to be indicative of contaminated soil.
18. **Response to Specific Comment 20:** Include a discussion and figures for iron.
19. **Response to Specific Comment 21:** Ensure that each constituent (based on EPA's approved list) found to exceed a regulatory standard must be addressed in the nature and extent section. This should be included both in text and figures.
20. **Response to Specific Comment 22:** Refer to Specific Comment Number 3 above. If you believe that other industrial activities at the lakefront contributed to the high PAH concentrations in the Kreher Park area, then the RI Report needs to identify the other possible sources, not just wood treatment. For example, the disparity between PAH concentrations within Kreher Park and the Upper Bluff could be from spills and leaks during the years of off loading PAH rich feed stock materials (gas oil, fuel oil) at the tank car siding for use at the MGP. This plant operated on a lot of liquid fuels and over its lifespan spills/leaks would be expected. This scenario should be added to the Conceptual Site Model (CSM) and associated narrative.
21. **Response to Specific Comment 24:** Address each constituent (based on EPA's approved list) found to exceed a regulatory standard in the nature and extent section. This includes both text and figure preparation.
22. **Response to Specific Comment 25:** New and/or revised figures exceeding regulatory standards should be included. Explain what is meant by compounds mentioned in statistical summaries.
23. **Response to Specific Comment 26:** Address each constituent (based on EPA's approved list) found to exceed a regulatory standard in the nature and extent section. This includes both text and figure preparation.
24. **Response to Specific Comment 27:** It must be made clear in the RI Report that the upper bluff, ravine and Kreher Park are connected.
25. **Response to Specific Comment 28:** Address each constituent (based on EPA's approved list) found to exceed a regulatory standard (see General Comment 2) in the nature and extent section. This includes both text and figure preparation.
26. **Response to Specific Comment 29:** Deeper monitoring wells might be required in the Copper Falls Aquifer at the shoreline to ensure that contamination is not flowing beneath the 24/25/26 monitoring wells that are screened at the top of this aquifer.
27. **Response to Specific Comment 31:** Just as for the soil and groundwater, the sediment analytical results must be compared directly to regulatory standards. The use of a

statistical approach to determine the nature and extent is not acceptable. Text and figures should be prepared in this fashion.

28. **Response to Specific Comment 32:** The response is acceptable, so long as a one to one comparison of each constituent found to exceed a regulatory standard is addressed. This includes both text and figure preparation.
29. **Response to Specific Comment 36:** Delete the statement that constituents have not been “detected at levels of concern,” because solvents (e.g., TCE) have been detected above regulatory standards in some media, which are risk based standards, therefore, indicating a potential concern.
30. **Response to Specific Comment 37:** The Nature and Extent section in the RI is not the section to discuss whether or not a constituent is a threat to human health and the environment. That is solely a discussion for the two risk assessment sections. Additionally, the fate and transport section must discuss each of the constituents (or constituent groups, such as VOCs, metals, etc.) that exceeded regulatory standards, regardless of their background concentrations or other proposed justifications.
31. **Response to Specific Comment 38, Second bullet:** There is no documentation in the RI Report about when the lumber companies began disposal of wood waste in the lake. There is no documentation in the RI Report on areas within the lake where the wood material disposal began. There is no documentation in the RI Report that the Ravine was not used for disposal of the coal tar from when the MGP started operations. There is a likelihood that the ravine was used for coal tar disposal from the MGP plant from day one of MGP operations, (also refer to Specific Comment 1 above) the coal tar would then discharge into the bay (portion that is now Kreher Park) and at that time wood may not have been disposed in the bay area where the coal tar was discharged. Coal tar would then be dispersed in the bay area by wave movements. This could have resulted in sediment contamination prior to placement of wood waste. If NSPS believes this is not correct a thorough demonstration needs to be provided in the RI Report.
32. **Response to Specific Comment 40:** This response to the comment does not address the comment. The response goes into detail regarding the DNAPL; however, the one detail that has yet to be explained, either in the RI Report, or the response to this comment, is why there is VOC contamination at these depths? It is stated that the upward gradients should retard contaminants from reaching these greater depths, in either dissolved or free phases. Explanations must be presented in the RI Report to explain the contamination that has been found at these depths.
33. **Response to Specific Comment 41:** Based on the discussions from the November 8, 2006, meeting, “primary constituents” will no longer play a role in the RI, because each of the constituents (from EPA’s approved list) will be evaluated/compared against regulatory standards.
34. **Response to Specific Comment 42:** The response to this comment indicates that contaminants are not continuing to migrate; however, EPA does not fully agree with this concept. Although confining conditions and upward gradients could be retarding contaminant distribution in the Copper Falls, it is unclear how contaminants have reached

the deeper portions of the Copper Falls (see comment 40 above), and it is fully plausible that contaminants are still migrating to these deeper depths (albeit at low concentrations currently).

Migration in the shallow fill layer in Kreher Park is also in hydraulic connection to Chequamegon Bay, and this migration pathway needs to be addressed in the RI. Although groundwater and lake elevations indicate that flow may be stagnant in Kreher Park, it is plausible and likely that during times of lower lake elevations, or higher groundwater elevations, groundwater will discharge to the Bay. This needs to be addressed in the Migration/Contaminant Transport section.

35. **Response to Specific Comment 43:** First paragraph: NSPW indicates in the RI Report that the shallow groundwater in Kreher Park is stagnant, and this prevents contaminant migration, which is plausible. However, it is likely that during times of lower lake elevations, or higher groundwater elevations, groundwater will discharge into the Bay. The groundwater is certainly not stagnant through the Upper Bluff and ravine area, and is flowing into the shallow Kreher Park groundwater system. The one question that remains unanswered is where the groundwater flows once it reaches the base of the ravine? This needs to be addressed in the RI Report, perhaps in terms of mass balance through the shallow groundwater system.

Second paragraph: There are large distances between monitoring wells in the Copper Falls through which contaminants could migrate if hydraulic conditions were to change.

36. **Response to Specific Comment 44:** This response still does not appear to be correct. The RI Report indicates that wells MW-2A/2B (NET) have “constant” concentrations. The graphs on Figure 5-5 show a spike in concentrations in 2A (NET), and a drastic drop in concentrations in 2B (NET) in the 2001/2002 timeframe. Re-evaluate the graphs on Figure 5-5, the database, and the original EPA comment.
37. **Response to Specific Comment 53:** Refer to the response to General Comment 5, seventh (last) bullet. Based on that response, the extent of free product (NAPL) should be extended throughout most of Kreher Park.
38. **Response to Specific Comment 54:** Although background concentrations for constituents such as arsenic may play a role in the RI, it is recommended that the background concentrations not be used as the lowest break point in the figures. The lower regulatory standards should still be used in the section 4 figures.
39. **Response to Specific Comment 57:** Revise the RI Report to evaluate for lead using background concentrations in the same way that arsenic will be discussed. The statement that lead is not associated with DNAPL contamination is not an acceptable means of dismissing lead concentrations in soil. The RI Report must be revised to address this.
40. **Response to Specific Comment 58:** With the change in methodology from the statistical approach to delineation to the one-to-one comparison approach, the RI should better describe the extent of contamination for benzene, naphthalene, and any other organics that exceed regulatory standards. Discussions similar to that presented in the

response to this comment should be included in the revised RI Report to ensure that the extent of contamination is fully understood by the readers.

41. **Response to Specific Comment 59:** Add a figure in the RI Report that depicts the concentration of contaminants based on the historic lakebed.

If you have any questions or would like to discuss things further, please contact me at (312) 886-1999.

Sincerely,

Scott K. Hansen
Remedial Project Manager

cc: Dave Trainor, Newfields
Jamie Dunn, WDNR
Omprakash Patel, Weston
Henry Nehls-Lowe, DHFS
Ervin Soulier, Bad River Band of the Lake Superior Chippewa
Melonee Montano, Red Cliff Band of the Lake Superior Chippewa

bcc: File, SR-6J
Craig Melodia, C-14J